

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE: * CASE NUMBER: 10-02306 ESL
*
MARY CARMEN ESCOBAR DIAZ *
*
Debtor (s) * CHAPTER 13
*
*

PROPOSED AMENDMENT OF THE CHAPTER 13 PLAN

TO THE HONORABLE COURT:

COMES now Debtor (s) represented by the undersigned counsel and respectfully Allege (s) and Pray (s) as follows:

1. Amend Chapter 13 Plan in order to provide for the payment of a priority claim. *Enclosed Please Find Proposed Amended Chapter 13 Plan.*

WHEREFORE, it is respectfully requested of this Honorable Court to approve the above indicated amendment.

In San Juan, Puerto Rico, this 13th day of July 2010.

I HEREBY CERTIFY: That on this same date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: Chapter 13 Trustee **Jose Ramon Carrion, Esq.**, US

Trustee **Monsita Lecaroz Arribas** and I hereby certify that I have mailed by regular mail to all creditors listed on the attached Master Address List.

RESPECTFULLY SUBMITTED.

/s/ Marilyn Valdes Ortega

MARILYN VALDES ORTEGA

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P.O. Box 19559

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United States Bankruptcy Court
District of Puerto Rico

IN RE:

Case No. **10-02306**

ESCOBAR DIAZ, MARI CARMEN

Chapter **13**

Debtor(s)

CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED:

☒ AMENDED PLAN DATED: **7/13/2010**

☐ PRE ☐ POST-CONFIRMATION

Filed by: ☐ Debtor ☐ Trustee ☒ Other

I. PAYMENT PLAN SCHEDULE

\$ **350.00** x **24** = \$ **8,400.00**
\$ **450.00** x **36** = \$ **16,200.00**
\$ x = \$
\$ x = \$
\$ x = \$

TOTAL: \$ **24,600.00**

Additional Payments:

\$ to be paid as a LUMP SUM
within with proceeds to come from:

☐ Sale of Property identified as follows:

☐ Other:

Periodic Payments to be made other than, and in
addition to the above:

\$ x = \$

PROPOSED BASE: \$ **24,600.00**

III. ATTORNEY'S FEES
(Treated as § 507 Priorities)

Outstanding balance as per Rule 2016(b) Fee
Disclosure Statement: \$ **2,900.00**

Signed: **/s/ MARI CARMEN ESCOBAR DIAZ**
Debtor

Joint Debtor

II. DISBURSEMENT SCHEDULE

A. ADEQUATE PROTECTION PAYMENTS OR \$

B. SECURED CLAIMS:

☐ Debtor represents no secured claims.

☒ Creditors having secured claims will retain their liens and shall be paid as follows:

1. ☐ Trustee pays secured ARREARS:

Cr. Cr. Cr.

\$ \$ \$

2. ☒ Trustee pays IN FULL Secured Claims:

Cr. **RELIABLE FINANCIAL** Cr. Cr.
845645007 # #
\$ **13,369.09** \$ \$

3. ☐ Trustee pays VALUE OF COLLATERAL:

Cr. Cr. Cr.

\$ \$ \$

4. ☐ Debtor SURRENDERS COLLATERAL to Lien Holder:

5. ☐ Other:

6. ☐ Debtor otherwise maintains regular payments directly to:

C. PRIORITIES: The Trustee shall pay priorities in accordance with the law.
11 U.S.C. § 507 and § 1322(a)(2) **FEES \$1,575.00**

D. UNSECURED CLAIMS: Plan ☐ Classifies ☒ Does not Classify Claims.

1. (a) Class A: ☐ Co-debtor Claims / ☐ Other:
☐ Paid 100% / ☐ Other:

Cr. Cr. Cr.

\$ \$ \$

2. Unsecured Claims otherwise receive PRO-RATA disbursements.

OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.)
See Continuation Sheet

Attorney for Debtor **Marilyn Valdes Ortega Law Offices**

Phone: **(787) 758-4400**

Debtor(s)

CHAPTER 13 PAYMENT PLAN
Continuation Sheet - Page 1 of 2

	Cr	#	\$
Executory Contracts - Assumed:	TRUJILLO ALTO EST		

Debtor(s)

CHAPTER 13 PAYMENT PLAN

Continuation Sheet - Page 2 of 2

TRUSTEE TO PAY ATTORNEY'S FEES BEFORE ANY SECURED OR PRIORITY CREDITOR.**ADEQUATE PROTECTION PAYMENT TO RELIABLE FINANCIAL UNTIL CONFIRMATION \$50.00 TO BE PAID BY TRUSTEE MONTHLY.****INSURANCE TO RELIABLE FINANCIAL THROUGH UNIVERSAL AT THE END OF SALES CONTRACT IN THE APROXIMATE AMOUNT OF \$ 2,000.00 DISBURSEMENT TO UNIVERSAL INSURANCE TO BEGIN AT END OF THE SALES CONTRACT ON MARCH 2012****ANY CHRISTMAS BONUS IF ANY THAT DEBTOR MAY PROSPECTIVELY RECEIVE FOR THE DURATION OF THE PLAN WILL BE PAID INTO THE PLAN, EXCEPT FOR THE FIRST \$1,000.00 DOLLARS AND THOSE AMOUNT REASONABLY NEEDED, WHICH WILL BE CONSULTED WITH THE TRUSTEE , SHOULD NO AGREEMENT BE REACHED WITH THE TRUSTEE IN THIS MATTER DEBTOR WILL MOVE THE COURT ACCORDINGLY, IN ORDER TO MAXIMIZE THE DISTRIBUTION TO GENERAL UNSECURED CREDITORS.****ANY POST PETITION TAX RETURNS THAT MAY PROSPECTIVELY ARISE FROM ANY TAX REFUND FOR THE DURATION OF THE PLAN WILL BE USED AS NEEDED TO FUND THE PLAN IN ORDER TO MAXIMIZE THE DISTRIBUTION TO GENERAL UNSECURED CREDITORS, AFTER ITS CONFIRMATION AND WITHOUT THE NEED FOR ANY FURTHER NOTICE, HEARING OR COURT ORDER, THE PLAN SHALL BE DEEMED MODIFIED BY THE INCREMENT(S) TO ITS BASE.**

Label Matrix for local noticing
0104-3
Case 10-02306-ESL13
District of Puerto Rico
Old San Juan
Tue Apr 13 11:42:16 AST 2010

ADVANCE COLLECTION SERVICES, INC.
PO BOX 364607
SAN JUAN, PR 00936-4607

BANCO POPULAR DE PR
PO BOX 70100
SAN JUAN, PR 00936-8100

DEPARTAMENTO DE HACIENDA
PO BOX 9024140
OFICINA 424 B
SAN JUAN, PR 00902-4140

MUEBLERIAS BERRIOS
PO BOX 674
CIDRA PR 00739-0674

ROOMS TO GO
PLAZA LAS AMERICAS POWER CENTER
CALLE CALAF #2
HATO REY, PR 00914

MARI CARMEN ESCOBAR DIAZ
COND VISTA DEL RIO APARTMENTS
345 CARR 8860 APT J1446
TRUJILLO ALTO, PR 00976-5415

BANCO BILBAO VIZCAYA ARGENTARIA
PO BOX 364745
SAN JUAN, PR 00936-4745

BANCO BILBAO VIZCAYA
PO BOX 71113
SAN JUAN, PR 00936-8013

CITIFINANCIAL
65 INF. AVE.
CONCORDIA SHOP CTR
RIO PIEDRAS, PR 00929

DEPARTAMENTO DEL TRABAJO
AVE. MUOZ RIVERA 505
HATO REY, PR 00918-3352

PR TELEPHONE CO
PO BOX 360998
SAN JUAN, PR 00936-0998

TRUJILLO ALTO ESTATES LIMITED, PARTNERS.
VISTA DEL RIO ADMINISTRATIVE OFFICES
345 CARR 8860, APT 1250
TRUJILLO ALTO, PR 00976-5521

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San Juan, PR 00901-1964

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RELIABLE FINANCIAL SERVICES
PO BOX 21382
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JOSE RAMON CARRION MORALES
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MONSITA LECAROS ARRIBAS
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OCHOA BUILDING
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SAN JUAN, PR 00901-1938

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)BBVA-P.O. BOX 364745, SAN JUAN, P.R. 0093

(u)ESCOBAR DIAZ, MARI CARMEN

End of Label Matrix
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Total 22